

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Commodity Futures Trading)	
Commission,)	
)	
Plaintiff,)	Civil Action No. _____
)	
v.)	
)	
Traders Global Group Inc., a New)	
Jersey corporation, d/b/a “My Forex)	
Funds”; Traders Global Group Inc., a)	
Canadian business organization; and)	
Murtuza Kazmi,)	
)	
Defendants.)	

[PROPOSED] ORDER ON EXPEDITED DISCOVERY

Before the Court is Plaintiff Commodity Futures Trading Commission’s (“CFTC” or “Commission”) *Ex Parte* Motion for Expedited Discovery pursuant to Rules 26(d)(1), 30(a) and (b), and 45 of the Federal Rules of Civil Procedure. Contemporaneous with this Motion, the CFTC also filed a Complaint for Injunctive and Other Equitable Relief and Penalties Under the Commodity Exchange Act (“Complaint”) against Defendants Trader Global Group Inc., a New Jersey corporation; Traders Global Group Inc., a Canadian business organization; and Murtuza Kazmi (collectively, “Defendants”), and a Motion for Statutory Restraining Order and Preliminary Injunction. The Court has reviewed the CFTC’s filings and fully advised itself of the record to date and circumstances of this matter.

THE COURT FINDS that, based on its review of the record to date and circumstances of this matter, good cause exists for the CFTC’s expedited discovery requests because the material sought is necessary to permit the CFTC to discover the

existence and location of Defendants' assets and the identities of Defendants' customers, and to allow the parties to prepare adequately for such hearings as the Court may conduct in this matter.

IT IS THEREFORE ORDERED that, pursuant to Federal Rule of Civil Procedure 26(d)(1), the CFTC's Emergency Motion for Expedited Discovery is granted. The CFTC is granted leave to:

- 1) request that Defendants produce any documents not otherwise required to be produced under any Statutory Restraining Order this Court may enter;
- 2) request that Defendants authorize, on an expedited basis, disclosure of any of Defendants' electronic communications materials maintained with third-party internet service providers such as Microsoft, Apple, Discord, and Meta;
- 3) issue subpoenas to third parties; and
- 4) take depositions of Defendants and third-parties.

This discovery is to be conducted for the purpose of obtaining Defendants' financial records, discovering the identity of Defendants' customers and the whereabouts of customer funds, and preparing for a hearing on the CFTC's Motion for Preliminary Injunction.

IT IS FURTHER ORDERED that Defendants' depositions shall be taken upon two (2) business days' notice, and Defendants shall respond to document production requests within two (2) business days. Non-parties shall be given seven (7) days' notice for depositions and shall respond to document production requests within seven (7) days. The Court will entertain motions pursuant to Rules 26(b)(2)

and 30(d) of the Federal Rules of Civil Procedure during the course of these proceedings.

IT IS SO ORDERED.

U.S. District Court Judge